

February 3, 2022

California Regional Water Quality Control Board
San Diego Region
2375 Northside Dr., Suite 100
San Diego, CA 92108

SUBJECT: Comment – Tentative Order No. R9-2022-0005 and Tentative Order No. R9-2022-0006

Dear Regional Board Members:

I am currently an elected director for Municipal Water District of Orange County (MWDOC) and prior to that I was a staff member at MWDOC for 37 years. Between about 2002 and 2014 I worked on the technical aspects of the Doheny Desalination Project on behalf of MWDOC to investigate the use of a subsurface slantwell intake system including the construction and operation of a test slantwell and treatment of the water. I have continued to follow the work completed by South Coast Water District (SCWD) on the technical evaluations and permitting of the project. I would strongly urge your support for approval of Tentative Order No. R9-2022-0005 and Tentative Order No. R9-2022-0006 to advance the Doheny Desalination Project through the Regional Water Quality Control Board's permitting process and towards construction of this essential water reliability project for SCWD and South Orange County.

Water resources supplying Southern California are continuing to experience increasingly extreme weather conditions, with less predictable precipitation and runoff patterns, followed by longer and more frequent dry and hot periods. Climate change is reducing the reliability of our supplies. The Doheny Project will produce locally available, high-quality water which is resilient to both climate change and drought. Possibly the most important aspect is the "locally available" characteristic as South Orange County has few local water resources but is subject to imported water that is treated adjacent to a fault and travels over 40 miles in pipelines crossing another four faults before reaching South Orange County. Having a new supply that can provide local reliability when the import system has outages is of great importance.

Your consideration of action on the Tentative Orders related to waste discharge requirements on March 9, 2022, is critical to protecting the quality of life and economy within the South Orange County region that will benefit from the Doheny Desalination Project. Not only will the project provide up to 5 MGD of reliable, locally-controlled water supplies, it will do so using technology that is environmentally protective of ocean resources and marine life through the use of slantwells to draw the water in from beneath the ocean. You have it within your ability as Members of the San Diego Regional Water Quality Control Board to approve these Tentative Orders to assure that unreasonable conditions are not imposed on the implementation of those Orders.

Again, I strongly urge your support – without unreasonable conditions – for Tentative Order No. R9-2022-0005 and Tentative Order No. R9-2022-0006 at your March 9, 2022 hearing. Please don't hesitate to contact me at karlwseckel@gmail.com or call at 714-423-3361 if you have any questions regarding my comments on these matters.

Sincerely,



Karl W. Seckel, P.E., Director MWDOC Division 4
Formerly staff member at MWDOC
Currently a publicly elected member of the Board at MWDOC